

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**VICTORIA L. FRAZIER,**

**Plaintiff,**

**v.**

**CIVIL NO. 3:11cv497**

**EXPERIAN INFORMATION SOLUTIONS,  
INC., et al.**

**Defendants.**

**PLAINTIFF'S SUPPLEMENTAL F.R.C.P. 26(a)(1) DISCLOSURES**

COMES NOW the Plaintiff, **VICTORIA L. FRAZIER**, by counsel, and makes the following supplemental disclosures:

**I. Individuals likely to have discoverable information**

12. Olga Macias  
c/o Surovell Isaacs Petersen & Levy PLC  
4010 University Dr  
Suite 200  
Fairfax, VA 22030

*All facts regarding Plaintiff's husband's loan modification and conversation with Ms. Graham, employee of Litton regarding Plaintiff not being a responsible party on the mortgage.*

**II. Description of documents in possession of the Plaintiff.**

Other than those documents obtained from any Defendant in discovery, the Plaintiff has the following supplemental and additional documents in her possession and control (*documents previously provided to the Defendant with discovery responses*):

Plaintiff's Bate Stamp Nos. 000416-000990

Documents produced pursuant to Subpoena from Trans Union – Bates # TU 1 – TU 120.

Plaintiff reserves the right to further supplement these disclosures.

**VICTORIA FRAZIER**

/s/

Leonard A. Bennett, Esq.  
VSB #37523  
Attorney for Plaintiff  
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Fairfax, VA 22030  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of March, 2012, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Gary L. Edwards  
Baker Donelson Bearman Caldwell & Berkowitz, PC  
100 Med Tech Parkway  
Suite 200  
Johnson City, TN 37604  
Email: [gedwards@bakerdonelson.com](mailto:gedwards@bakerdonelson.com)

*Counsel for Litton Loan Servicing, LP.*

**VICTORIA L. FRAZIER**

/s/

Leonard A. Bennett, Esq.  
VSB #37523  
Attorney for Plaintiff  
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